

COURT OF COMMON PLEAS OF FRANKLIN COUNTY

- - - - -
SERRINA JACKSON,)
)
Plaintiff,)
)
vs.) Case No.
) 20 CV 3067
JOE RICHARD, et al.,)
)
Defendants.)
- - - - -

Wednesday, December 9, 2020
11:30 a.m.

REMOTE DEPOSITION OF SUNDEEPTI JINDAL

- - - - -
Jackie Olexa White
Registered Merit Reporter
- - - - -

A P P E A R A N C E S

APPEARING REMOTELY:

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Also Present: Mr. Richard

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Wednesday Morning Session

December 9, 2020

10:00 a.m.

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STIPULATIONS

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It is stipulated by and between counsel for the respective parties that the deposition of TIFFANY THOMAS, a witness herein, called by the plaintiff under the statute, may be taken at this time and reduced to writing in stenotypy by the Notary, whose notes may then after be transcribed out of the presence of the witness; that proof of the official character and qualification of the Notary is waived; that the examination, reading and signature of the said TIFFANY THOMAS to the transcript of her deposition are not waived by counsel and the witness.

- - - - -

1 (Thereupon, all counsel agreed that the
2 witness could be sworn in by the court reporter
3 remotely.)

4 SUNDEEPTI JINDAL
5 being first duly sworn, as hereinafter certified,
6 testifies and says as follows:

7 - - -

8 CROSS-EXAMINATION

9 BY MS. PETERSON:

10 Q. Good morning. My name Kirstin Peterson.
11 I'm one of the attorneys for plaintiff, Serrina
12 Jackson, in this ongoing lawsuit. I just want to go
13 over a couple ground rules for this deposition. Have
14 you ever been deposed before?

15 A. No.

16 Q. Okay. So just a couple rules. I do
17 request that you answer verbally, you know, yes or
18 no, as opposed to shaking your head, nodding your
19 head, just so the court reporter can get the answers
20 on the record.

21 I do request that you let me complete my
22 question before providing your answer, and I will
23 provide the same courtesy to you. And I'm not here
24 to confuse you or anything, so if you need

1 clarification about any questions, just ask, and I'm
2 happy to reword.

3 And, lastly, some of this stuff can be,
4 you know, a little bit uncomfortable to deal with.
5 So if at any time you need a break, just advise, and
6 we'll be happy to give you one. Okay?

7 A. Okay.

8 Q. Have you taken any medication or illicit
9 drugs that would impair you to testify truthfully
10 here today?

11 A. No.

12 Q. Do you suffer from any emotional,
13 physical, or psychological condition that would
14 impair you to testify truthfully today?

15 A. No.

16 Q. Did you review anything in preparation for
17 today's deposition?

18 A. I reviewed my statement that I made with
19 Kathleen Bourke at the city.

20 Q. Okay. I'm just going to go over some
21 background information with you. Can you please
22 state your full name for the record?

23 A. Yes, Sundeepti Jindal.

24 Q. What is your current address, Miss Jindal?

1 A. My current address?

2 Q. Yes.

3 A. 2128 Statham Court, Dublin, Ohio, 43016.

4 Q. What is your date of birth?

5 A. November 5, 1993.

6 Q. Okay. Miss Jindal, where did you attend
7 high school at?

8 A. Worthington Kilbourne.

9 Q. And did you graduate?

10 A. Yes.

11 Q. What year would that have been?

12 A. 2011.

13 Q. And did you do any post secondary
14 education following high school?

15 A. Yeah, I went to Ohio State.

16 Q. And did you get a degree from Ohio State?

17 A. Yeah, I got my bachelor's in 2016.

18 Q. What did you major in?

19 A. Political science.

20 Q. That was also my major. Good choice. Any
21 education following Ohio State?

22 A. No.

23 Q. Tell me about your first job following
24 graduation from Ohio State. Where were you employed?

1 A. I was employed at Ohio State at the Crane
2 Center for early childhood research and policy, and I
3 was project manager for a project called Kids in
4 Columbus study, that studied the effects of effective
5 poverty on kids in Franklin County.

6 Q. Oh, very interesting. How long were you
7 employed with Crane Center?

8 A. About a year and a half.

9 Q. So would your employment have ended --
10 would it have been 2017 or 2018?

11 A. 2017.

12 Q. And tell me about your next job following
13 Crane Center.

14 A. I was at the Women's Fund of Central Ohio,
15 and I was there for about a year and a half. And I
16 was the community education and research manager
17 there. So just did a lot of -- headed up a lot of
18 their research work and policy research there.

19 Q. And when you left Women's Fund of Central
20 Ohio, is that when you started your employment with
21 the City of Columbus?

22 A. Yes, in February of 2019.

23 Q. And what office were you employed with
24 with the city?

1 A. The mayor's office.

2 Q. Tell me about your specific job including
3 the title and the duties.

4 A. Yeah, I was the gender equity advisor.
5 The duties -- the duties kind of were just whatever
6 needed to be done, but we did a lot of work in pay
7 equity around the city as well as health equity, so
8 working with local partners to figure out what the
9 city could do to increase health and pay equity.

10 Q. Are you still employed in this position
11 with the mayor's office?

12 A. No.

13 Q. When did you leave?

14 A. August of 2020.

15 Q. And why did you leave your position with
16 the mayor's office?

17 A. I just found a new position.

18 Q. And what was that position?

19 A. I'm working at COTA as a project manager.

20 Q. So you've been with COTA since August?

21 A. Since September.

22 Q. Since September, okay. And you're still
23 working for COTA, correct?

24 A. Yes.

1 Q. Okay. I want to go back to your
2 employment with the mayor's office. Who was your
3 direct supervisor?

4 A. Shelly Beiting, B E I T I N G. I think
5 that is how you spell it. I'm not exactly sure.

6 Q. I believe that is correct as well.

7 Okay. When you started with the mayor's
8 office in February of 2019, did you receive any sort
9 of written documentation with respect to sexual
10 harassment?

11 A. I might have. I know that we did -- like
12 in our orientation, we definitely had to watch a
13 training video. I think I might have gotten
14 something written, but I'm not 100 percent sure.

15 Q. Do you remember approximately when you
16 watched that training video? Would it have been
17 right when you started in February?

18 A. Yeah, I think I did my orientation the
19 first month I was there -- no, it was probably
20 February.

21 Q. Okay. Did you receive any other training
22 with respect to sexual harassment or watch any other
23 videos after that initial video in February?

24 A. No, not that I can remember.

1 Q. When you were employed with the City at
2 the mayor's office, did you personally know how to
3 report sexual harassment?

4 A. I think so. I think we were just supposed
5 to tell -- okay, maybe not. No. I'm pretty sure we
6 were just supposed to tell a supervisor or our HR
7 representative that we, like, had, who I knew. I
8 knew who our HR person was.

9 Q. Who was your HR person?

10 A. Oh, no, I forget her name right now. Oh,
11 Lanita Smith.

12 Q. How do you spell Lanita, if you remember?

13 A. L A N I T A.

14 Q. In your personal opinion did the city
15 provide sufficient sexual harassment training to its
16 employees in 2019?

17 A. Yes.

18 Q. I'm going to switch gears here a little
19 bit and talk about Joe Richard. Did you know
20 Joe Richard?

21 A. Yes.

22 Q. Like when did you first meet him?

23 A. I met him -- I think our first meeting
24 that I was at was in February for the Bloomberg

1 project, so I think it was February. It was
2 definitely early on.

3 Q. Okay. Do you recall where that first
4 meeting took place?

5 A. Yes, it was in the mayor's office on the
6 third floor in the innovation office. I guess it
7 wasn't the mayor's office. It was city hall, but
8 third floor, innovation office.

9 Q. So were you guys working on the Bloomberg
10 project together?

11 A. Yes. I think there were probably eight of
12 us, and Shelly was on it. And then when I joined she
13 kind of -- she was also attending a few meetings, but
14 I think I was kind of from the commission side was
15 put on it.

16 Q. So you were basically representing the
17 Woman's Commission?

18 A. Yes, correct.

19 Q. And who or what entity was Joe Richard
20 representing?

21 A. Fire, I believe.

22 Q. And you said you think there were about
23 eight people on it. Do you recall the names of those
24 other individuals?

1 A. Yes. Do you want me to tell you?

2 Q. Yes, if you could walk through those
3 people.

4 A. Okay. It was Doug Murray. He was in the
5 mayor's office, and he was with external affairs.
6 Dawn Tirely, who was also in the mayor's office.
7 She's the chief. Oh, my gosh, I'm so bad with names
8 right now. I know Mike Stevens was on it. Now he's
9 the director of development, I believe, but at the
10 time he was the chief innovation officer.

11 Who else is on it? Randall Sistrunk was
12 on it, but then he left, like, a few months in to it
13 and then left the city.

14 Q. Do you know how to spell Randall's last
15 name?

16 A. I think it's S I S trunk, T R U N K.

17 Q. Got it.

18 A. And then director -- what's her name?
19 She's director of -- I don't remember her name, but I
20 know -- one person's first name was Liz, and I forget
21 her last name. But she was in the same department as
22 one of the -- the director of like the people who do
23 all the testing. Does anyone know what that's
24 called?

1 Q. It's okay.

2 A. So there was a few other people. I don't
3 think I remember anyone else.

4 Q. And it's perfectly fine to say you don't
5 remember. I'm not going to pressure you for an
6 answer. Just say that, and it's no problem.

7 Joe Richard, he wasn't your supervisor at
8 any time, is that correct?

9 A. No, he was not. Yes, correct.

10 Q. Your only interaction with him with
11 respect to your job was this Bloomberg project?

12 A. Correct.

13 MS. PETERSON: Okay. Miss Jindal, I kind
14 of want to walk through your statement with Kathleen
15 Bourke of the public safety director's office. And
16 we'll mark this as Plaintiff's Exhibit 1.

17 (Plaintiff's Exhibit 1 was marked for
18 identification.)

19 Q. Just give me one second as I read through.
20 Do you have a copy of this in front of you? It's
21 okay if you don't have one.

22 A. I do have it.

23 Q. Just pull it out because it might be
24 easier to walk through it. Is it up, I'm sorry?

1 A. Yes, it is.

2 Q. So I'm looking at Page 1, and I'm just
3 going to kind of read through some of this. Starting
4 at Line 37 Miss Bourke says: Okay. So, basically,
5 you mentioned before we turned on the recorder that
6 there were some times when you had to interact with
7 Chief Richard where he made you feel uncomfortable.
8 Can you give me some specific examples of what you
9 mean?

10 Miss Jindal: Yeah, well, it kind of
11 started right from the beginning. Where now looking
12 back at it, he would just stand, like, real closely
13 and, like, just ask a lot of questions and always be,
14 like, oh, you're my partner in this. And then, like,
15 ask my number, and then would text me, like, hey,
16 partner, when he could have like, et cetera, et
17 cetera.

18 These texts that you referred to, do you
19 still have them?

20 A. I don't know. I might. I don't delete my
21 texts, so I might have them, but I'm not sure.

22 MS. PETERSON: Okay. If you do have those
23 texts, is it okay, Alana, Natalie, if we get a copy
24 of them?

1 MS. TANOURY: Yes. We'll check with Miss
2 Jindal to see if she still has them.

3 MS. PETERSON: Oh, okay.

4 Q. When Richard would stand really close to
5 you, where would this occur?

6 A. Just like in our meetings.

7 Q. Were there other people around in those
8 meetings or would this be one on one?

9 A. No, it would be other people in the
10 meetings. I think he generally just stands really
11 close to people.

12 Q. Okay. And I might jump around here a
13 little bit, so forgive me.

14 A. Okay.

15 Q. Page 2, Line 62, and you're talking about
16 a time that Richard had made you really
17 uncomfortable. You state, Miss Jindal: We had like
18 a focus group or something, and then afterwards he,
19 like, walked me to my car. And, I mean, I didn't ask
20 him to, but he just kind of, like, followed me to the
21 car. Like as we -- I mean, we were talking, and then
22 he just, like, stopped at the car. And then I was,
23 like, trying to get in the car and he was just, like,
24 oh, wait, I want to ask you a question. And then we

1 just started talking. And then he asked if I had a
2 boyfriend. And I was, like, no. And he was, like,
3 why? How could you not have a boyfriend? And I was,
4 like, I don't know. And then he was, like, have you
5 ever had a boyfriend? And I was, like, no, I've
6 never -- I don't know if I just, like, said, oh, I've
7 never had a boyfriend to just kind of have him please
8 stop talking about it.

9 Do you remember making this statement to
10 Miss Bourke?

11 A. Yes.

12 Q. Do you remember approximately when this
13 interaction that we just described occurred with
14 Mr. Richard?

15 A. Date-wise or time-wise?

16 Q. Date-wise.

17 A. No. I know it was closer to the end of
18 the project, because this was, like, the last big
19 part that we did before we discussed, like, the final
20 steps. I mean, I could try guessing, but I have no
21 idea what month this was.

22 Q. And you'll have to forgive me, I don't
23 know the timeline of the Bloomberg project.

24 A. From what I remember, it ended in, like,

1 May or June of 2019. I know it was still kind of
2 cold out, but not super cold. I don't know if that's
3 helpful. So maybe April.

4 Q. Okay. Do you know if anybody else saw
5 this conversation take place? Did you see anybody
6 else while this conversation --

7 A. People walked out to their cars, but then
8 they just left, so not really.

9 Q. Do you know if anybody -- did you see
10 anybody else who would have been within earshot of
11 this conversation?

12 A. No.

13 Q. You go on to describe the conversation a
14 little bit further. I won't read directly from here,
15 instead I want you to tell me how the rest of the
16 conversation went, to the best of your knowledge.

17 A. Yeah, so he asked if I had a boyfriend,
18 and I said no. And then he kind of started
19 suggesting and saying like if you never had a
20 boyfriend then can I -- is it safe to assume, and I
21 played dumb, and I was like what does that mean. He
22 said is it safe to assume, and then he started like
23 looking at me kind of suggestively. And I was like I
24 don't know exactly what you're asking.

1 And then from what I remember, he asked
2 point blank, are you a virgin. And, yes, then I
3 said -- I think I answered him. And then he started
4 asking what, like, ethnicity of men that I have been
5 with or what race. He was like have you ever been
6 with a black man and asked -- started asking about my
7 mom, because he knows she's a single mom, and started
8 asking if she dates anyone.

9 I think within the same conversation is
10 when he asked like is everything on my body real, and
11 I was like, I don't know why you're asking me that.
12 And then he said because a lot of women, like, get
13 stuff done, and it actually looks worse than being
14 natural. And I was like, well, people don't get
15 things done for men. So I don't think you need to
16 comment on that. And he was like, well, are your
17 eyelashes real. And I was like yes. And I think
18 that's the gist and the big part of the conversation,
19 definitely the stuff that made me feel the most
20 uncomfortable is why I remember it. I know we talked
21 for a while, so I don't know what else we discussed
22 at that instance.

23 Q. Sure. Let's dissect that a little bit.

24 When you said he was looking at you suggestively, was

1 he looking at any specific part of your body? I

2 don't mean to make you uncomfortable, but --

3 A. I don't remember exactly now. I just
4 remember feeling very uncomfortable with the way he
5 was looking at me. I don't know if he was looking at
6 a certain part or just, like, my whole body.

7 Q. Okay. And where did this conversation
8 occur?

9 A. I think it's the fire academy. It's where
10 they train the new recruits.

11 Q. And in the parking lot, correct?

12 A. Yes, in the parking lot.

13 Q. About what time of day was it, if you
14 remember?

15 A. I know it was in the evening. I don't
16 remember exactly. It was after, like, 5:00 o'clock
17 for sure because we had held a focus group that
18 started at, like, 5:00 o'clock, I believe. So it was
19 probably around 7:00, 7:30.

20 Q. Okay. When Mr. Richard made the comment
21 to you -- comment or question, I guess -- something
22 along the lines of asking if you were a virgin, did
23 you find that to be inappropriate?

24 A. Yes.

1 Q. Did it make you feel uncomfortable?

2 A. Yes. I believe I said that to him.

3 Q. You believe --

4 A. I said that's a weird question or
5 something along those lines, yes.

6 Q. How did he respond to that, if you
7 remember?

8 A. He just kind of brushed it off and then
9 kept asking questions or, like, continued the
10 conversation.

11 Q. When he asked you about the ethnicity
12 and/or race of the men you had been with, did you
13 find that to be inappropriate?

14 A. Yes.

15 Q. Did that make you uncomfortable?

16 A. Yes.

17 Q. When he asked you if everything on your
18 body was real, did you find that to be inappropriate?

19 A. Yes.

20 Q. Did that make you uncomfortable?

21 A. Yes.

22 Q. And tell me a little bit further about
23 what exactly he was asking about with respect to your
24 mom?

1 A. He was asking if she dates or if she would
2 date someone, would she date a black man. Because he
3 was asking about, like, being Indian, do we have to
4 marry Indian people, or would people be open to
5 marrying, like, other races or ethnicities. And so
6 then he was just asking about my mom in that respect.

7 Q. Did he ever ask you or you and your mom --
8 I'm sorry, let me rephrase. Did he ever invite you
9 and your mom over for dinner?

10 A. Over to his house?

11 Q. Yes. Did he ever invite you guys over to
12 his house?

13 A. No.

14 Q. Did he ever want to go to dinner with you
15 guys anywhere?

16 A. Yes.

17 Q. Did he say a specific place or was that at
18 your house or --

19 A. He had asked to go to, like, dinner at a
20 restaurant or lunch at a restaurant, and then also
21 had said, like, oh, when your mom cooks food, you
22 should invite me over to your house, and I could eat,
23 like, home-cooked Indian food.

24 Q. Did you find Richard's line of questioning

1 with respect to your mom and who she's dated, if she
2 would ever date a black man, did you find that to be
3 inappropriate?

4 A. Yes.

5 Q. Did it make you uncomfortable?

6 A. Yes.

7 Q. Did you ever follow-up with Richard about
8 these dinner or lunch plans?

9 A. No.

10 Q. Did Richard give you his number in this
11 conversation?

12 A. No, I already had his number.

13 Q. When and how did you come to have his
14 number?

15 A. So we -- and I don't remember exactly
16 when, but we got put into smaller groups that we had
17 to separate out and do like different -- we were
18 looking at three different things, so we were in like
19 three or four different groups. So I was in his
20 group. So there were four of us, and we all
21 exchanged numbers so we could talk about the project.

22 Q. Got it. Understood.

23 How long -- this conversation that we've
24 been talking about in the parking lot, if you had to

1 approximate, how long did that conversation last?

2 A. Probably like 40, 45 minutes. It felt
3 like a long time, but I don't really remember.

4 Q. And where in the parking lot were you guys
5 standing when this occurred?

6 A. Like, by my car. It was like -- yeah.
7 But where exactly, it was, like, closer to the
8 buildings. I don't know if that helps.

9 Q. I guess I was just wondering if you guys
10 were by your cars, so you answered the question.

11 A. Yes, okay.

12 Q. Just reading through here, bear with me.
13 Did you guys discuss anything else in this
14 conversation that we haven't discussed yet?

15 A. Not that I can remember, no.

16 Q. I'm looking at Page 6 of your interview
17 transcript now.

18 A. Okay.

19 Q. The first full paragraph.

20 A. Oh, yes, I remember that.

21 Q. Okay. Yeah. Basically, I thought that
22 might refresh your recollection. Can you tell me
23 what you were talking about here between Lines 224
24 and 239.

1 A. Yes. So I think this conversation
2 happened -- so inside we were talking with, like, the
3 rest of our group who -- they know a lot about the
4 Firefighter Mile. So she was just kind of explaining
5 to me what it was. Because at the end of the
6 conversation, they were talking about the Firefighter
7 Mile a lot with the firefighters and the focus group.
8 And I just didn't understand exactly what it
9 entailed.

10 So afterwards I was asking her what is the
11 Firefighter Mile. So she was explaining it to me,
12 and was, like, yeah, you should come see it, because
13 those are one of the reasons that we think, like, a
14 lot of women get nervous, and, like, don't feel,
15 like, they could physically get through the
16 Firefighter Mile, and might be a reason that we see
17 less women going out into fire, so you should come
18 out and look at it.

19 And then we went outside and we were
20 talking about it as well. And that's when Joe had
21 said that he is going to be there tomorrow -- or she
22 had mentioned I think there is one tomorrow that you
23 could go to. It's right here at the, like, training
24 place. And he was like, yeah, I'll be there, and you

1 should come. I was, like, yeah, of course, like,
2 that would be interesting to come see. I'll look at
3 my schedule, what time is it.

4 And then when we were at my car, that's
5 when he got, like, weird and he was like don't
6 dress -- like don't you come in your work clothes.
7 Because usually I wore, like, you know, like nice
8 clothes. He was like don't wear your work clothes
9 because you could, like, do some of the actual
10 activities so you could see how it is. And I was
11 like, okay, cool.

12 Then he was like but don't dress like all
13 sexy. And I was like, well, I don't dress sexy. And
14 then he was like, you know what I mean, like don't
15 come in, like, really tight clothes because then,
16 like, people won't be able to focus. I was like, I
17 think they will be fine, and I won't.

18 I think he could tell I was uncomfortable
19 when that happened because he kind of, like, dropped
20 that, and was like, anyways, just come or something.

21 And then the next day he texted me about
22 it in the morning, he said you can just come in your
23 normal work clothes, but you should come anyway and
24 see it. So I felt like he might have known that I

1 was like what are you saying.

2 Q. Sure. And a few follow-ups for that. You
3 were referencing she was telling you about a
4 Firefighter Mile, who is the she you're referring to?

5 A. That's the name I can't remember. She's
6 the director of one of the departments. I don't know
7 why I can't remember her name. I worked with her.

8 Q. She was on the Bloomberg project with you?

9 A. Yes, she was.

10 Q. Did you end up going to see the
11 Firefighter Mile the following day?

12 A. No, I did not.

13 Q. And why didn't you end up going?

14 A. Because I felt really uncomfortable with
15 the conversation before, and I didn't want to see
16 him, so I decided not to go.

17 Q. So your specific reason for avoiding the
18 Firefighter Mile was because you didn't want to see
19 Richard?

20 A. Yes.

21 Q. So when Richard made the comment to you of
22 something along the lines of don't dress all sexy,
23 don't where tight clothes because people won't be
24 able to focus, did you find that to be inappropriate?

1 A. Yes.

2 Q. Did that make you uncomfortable?

3 A. Yes.

4 Q. Did Richard try to physically touch you at
5 any point in this conversation?

6 A. I think there was one point where he put
7 his hand on my back, but, like, just patted it. And
8 then we really were not like super close the whole
9 time because I was kind of in my car, and then he was
10 on the other side of the door.

11 Q. Gotcha. This pat on the back, was it
12 upper back? Lower back?

13 A. I don't remember.

14 Q. Did he try to hug you at any point in the
15 conversation?

16 A. At the end, he just, like, asked for a
17 hug. And, yeah, he was just like you're just going
18 to say by and not hug me or something. And I was
19 like, yeah, I don't hug people that I don't know very
20 well.

21 Q. So you didn't hug him?

22 A. No.

23 Q. Did you ever tell anybody within the
24 mayor's office about this conversation?

1 A. Yes, I told one of my co-workers, Doug.

2 He was on the project as well.

3 Q. Remind me of Doug's last name.

4 A. Murray.

5 Q. And you stated he was your co-worker?

6 A. Yes.

7 Q. Was he in a supervisory position over you?

8 A. No.

9 Q. Did you tell anyone else within the
10 mayor's office about the conversation?

11 A. Not that I can remember, no.

12 Q. Anybody else involved with the Bloomberg
13 project that you can recall that you told?

14 A. No.

15 Q. Okay. Then just to confirm, he texted you
16 the next morning trying to get you to come to the
17 Firefighter Mile?

18 A. Yes.

19 Q. And you may have already said this, and
20 I'm sorry, what was your response when he texted you?

21 A. I believe that I told him that I had a
22 meeting until some -- I can't remember exactly, but I
23 think I had told him that I had a meeting, and that I
24 was going to try to make it, but I wasn't sure if I

1 was going to be able to.

2 Q. Did Richard ever call you on the phone?

3 A. Yes.

4 Q. How many times?

5 A. Oh, I don't know. I'm not really sure I
6 remember, but at least two times.

7 Q. When you say at least two, would it have
8 been more than five or --

9 A. I really don't remember. Probably not
10 more than five.

11 Q. I want to talk about a specific
12 conversation that you mention starting on Page 9 in
13 your transcript about the conversation that occurred
14 when Richard was in Maryland.

15 A. Okay, yeah.

16 Q. Do you recall that conversation?

17 A. Yes.

18 Q. Why don't you go ahead and walk me through
19 that.

20 A. He had missed one of the meetings, because
21 he was going to be in Maryland for something. So he
22 called me and was just asking about the project. And
23 I was like, oh, there wasn't really much that we had
24 to do or there wasn't much that you missed, but I'm

1 sure when you come back, we'll do a recap like we
2 always did at the beginning of our meetings.

3 Then he just started asking me more random
4 stuff and was asking me how my day was. And I think
5 that's -- I don't remember. This is like so long ago
6 now, so I don't remember. But I just remember
7 thinking that it was weird that he called me while he
8 was still in Maryland to talk about the meeting that
9 wasn't that important of a meeting. It was just one
10 of our check-in meetings.

11 Q. When you say he started asking you about
12 things outside of the meeting, were they personal
13 questions about you?

14 A. I think it was just like how has your week
15 been. Yes, so, yes, but nothing like -- nothing that
16 I can remember that was out of the ordinary.

17 Q. Okay. Do you know how many times Richard
18 texted you, like how many separate days?

19 A. No.

20 Q. In your opinion, was he texting you often
21 or was it just a couple of times?

22 A. I don't remember, but I don't think it was
23 like super often.

24 Q. Okay. So I want to go to Page 10. I'm

1 going to read part of the transcript for the record.

2 I'm going to start at Line 421.

3 Miss Bourke: Okay. So there was that
4 instance there at your car where he made those
5 comments to you. Were there any other times that he
6 made comments to you that you felt were
7 inappropriate, unprofessional?

8 Miss Jindal: Yes. Yeah, he would -- I
9 mean, he would always -- like he would always try
10 sitting right next to me, like, during those meetings
11 and, like, stare at me like -- and I told you this
12 earlier that from reading those, like, articles in
13 the Dispatch, like those are some of the things I had
14 just brushed aside.

15 What are those things that you're
16 referring to with respect to the articles in the
17 Dispatch?

18 A. I don't remember exactly now, but I think
19 it was just some of those -- like some things like
20 stand close or sit close or just say things or look
21 at people certain ways. That after reading them, I
22 was like, oh, yeah, he would do that to me as well,
23 and I remember feeling like a bit uncomfortable, but
24 I just brushed them away. So I think when I was

1 reading those articles -- and I don't really remember
2 what was in those articles now any more, so I don't
3 know exactly what I was referring to in that.

4 Q. Okay. No problem. When you would say
5 that he would stare at me, was he staring at a
6 specific part of your body?

7 A. I don't remember now. I just know
8 sometimes I would look up, and he would be, like,
9 looking at me.

10 Q. Did that make you uncomfortable?

11 A. Yes, sometimes. Yes.

12 Q. Okay. I'm going to go to 429, and you
13 say: He would do those things, and he would just
14 stare and be, like, are you ready, partner.

15 How many times did he say: Are you ready,
16 partner, to you?

17 A. I don't know, a few times.

18 Q. Would this have been in a one-on-one
19 setting or a group setting?

20 A. Like it would always be in the room with
21 people, but there are oftentimes it would just be the
22 two of us, and that's when he would say it. I never
23 fully understood what he was referring to, because he
24 would just be, like, are you ready? I don't really

1 know what you mean.

2 Q. Did he ever elaborate when you would say,
3 I don't really know what you mean?

4 A. I don't remember.

5 Q. And when you say you were in the room with
6 people, but it was just you two, is it fair to say
7 nobody else was within earshot of these
8 conversations?

9 A. Yeah, probably not. Because everyone was
10 like having their own conversations as well.

11 Q. You mention Page 11 -- I'll start on Page
12 439. Miss Bourke: And, again, like I don't want to
13 put words in your mouth. I'm just trying to kind of
14 figure out all that happened. So was there ever a
15 time where you felt like he was staring at, like, a
16 particular body part instead of, you know, your face
17 or anything like that?

18 Miss Jindal: Yeah. And I think there
19 was, but it was -- yeah, I think it was my chest that
20 I felt like he was, but I don't know for sure. That
21 would be just like speculation.

22 Do you recall making this statement to
23 Miss Bourke?

24 A. I do not remember that exact statement,

1 no.

2 Q. Do you recall him ever looking at your
3 chest?

4 A. Yes, but, again, I feel -- yes, but I
5 don't know if that's exactly what he was looking at,
6 but it felt like that.

7 Q. Okay.

8 A. Especially with the conversation by the
9 car when he was asking if everything was real. I
10 think that might have been what I was referring to,
11 but I'm not exactly 100 percent sure.

12 Q. Understood. How many times do you think
13 you interacted with Mr. Richard?

14 A. It would usually be at least once or twice
15 a month. So from February to May. Is that four
16 months, five months.

17 Q. Yeah.

18 A. So probably around eight to ten-ish times,
19 because then we had those focus groups. So, yeah,
20 probably around eight to ten.

21 Q. Okay. When you say focus groups, were
22 there people outside of the Bloomberg project
23 involved in these groups?

24 A. Yeah. So they were focus groups with fire

1 cadets, if that's what they are called. But, like,
2 they were in the fire department, and they were like
3 the newer -- yeah.

4 Q. Do you remember -- and you may not, and
5 that's totally fine -- do you remember the names of
6 any of these cadets who came to the focus groups?

7 A. No, I don't.

8 Q. Okay. Did Mr. Richard ever ask you to
9 send pictures of yourself to him?

10 A. Yeah, one time when I was going to Vegas
11 with my friends. And he was like, oh, send me, like,
12 pictures. I went in May. So that was in May. So
13 the project must have gone further than May, like
14 probably June.

15 Q. Okay. And when he asked for pictures was
16 it of you? Was it of something else?

17 A. He didn't say. He just said send
18 pictures.

19 Q. Okay. Did you send him any pictures?

20 A. No.

21 Q. Okay. And this will be a little bit
22 uncomfortable, so I'm sorry to ask. Did he ever ask
23 you specifically for sexually explicit pictures?

24 A. No, he did not.

1 Q. I'm looking at Page 13 of your
2 transcripts, Line 534.

3 Miss Jindal: I mean he said -- he said
4 stuff about, oh, when you were in Vegas, like you
5 were probably in your bathing suit, and I'm sure guys
6 were, like, all over you. And I just like played
7 dumb, and I was like, no, et cetera, et cetera.

8 When did this conversation occur?

9 A. Oh, I don't remember. Before May, because
10 it was -- I remember telling them I couldn't -- I
11 couldn't attend one of the meetings because I was
12 going to be in Vegas. And that's when that
13 conversation -- oh, wait, no, just kidding. No, this
14 was after. So this must -- I don't remember, but
15 this was after I came back, because he was saying,
16 like, oh, you probably -- yeah, he was saying, like,
17 what happened, like, were there any guys or whatever.
18 So this is after. So at the end of May or beginning
19 of June. I don't remember.

20 Q. Okay. And where did that conversation
21 take place?

22 A. I don't remember.

23 Q. Do you recall if it was in person?

24 A. Yeah, I think most of our conversations

1 took place in person. There was like a very few
2 times where it was on the phone, but we never talked
3 about stuff like this.

4 Q. Okay. Did you find him commenting about
5 you being in your bathing suit and guys being all
6 over you, did you find that to be inappropriate?

7 A. Yes.

8 Q. Did it make you uncomfortable?

9 A. Yes.

10 Q. Okay. In reading further down that page,
11 540.

12 Miss Bourke: Okay, gotcha. Can you think
13 of any other specific comments that he might have
14 made to you about, you know, your appearance, or, you
15 know, dating, anything like that, anything that we're
16 missing?

17 Miss Jindal: He would say, like, oh,
18 Indian women are the prettiest. Then I think one
19 time he was like, oh, yeah, I like Indian women are
20 the prettiest, and, like, look at you or something,
21 and, yeah. But, like, most of the time we would be,
22 like, in group settings, so it would be more like the
23 suggestive random stuff than blatantly saying things
24 to me.

1 Do you recall making this statement to
2 Miss Bourke?

3 A. Yes, I do.

4 Q. Do you recall when -- and if you don't,
5 it's okay -- that he made the comment about Indian
6 women are the prettiest?

7 A. I don't remember. I think he said it at
8 the car, but I don't know if that was the first and
9 only time that he said it.

10 Q. Okay. So you're not sure if he said it
11 once or if he said it more than once?

12 A. Yeah, I'm not sure. I don't remember now.

13 Q. That's no problem. And you said he would
14 say stuff that would be more suggestive random stuff
15 than, like, blatantly saying things to you.

16 A. Yes.

17 Q. Do you recall what any of those statements
18 would have been?

19 A. No, I don't.

20 Q. Okay. No worries. Further -- a little
21 bit further down, Line 55.

22 Miss Jindal: And then I remember when I
23 was leaving I, like, went pretty quickly to my car,
24 and got in and started driving away. And then he

1 started -- then he came out before I could, like,
2 actually get out of the parking lot area. And he,
3 like, stopped my car and, like, made me put the
4 window down. And then he was telling me that we need
5 to hang out. Oh, he would always say, like, I'll
6 take you to lunch and I'll pay for you, and, like,
7 let's go to get Indian food or something. Do you
8 recall when this occurred?

9 A. When?

10 Q. Yes.

11 A. No.

12 Q. Okay. No problem. Were you -- so you
13 mentioned that you had -- you were leaving pretty
14 quickly, trying to get to your car. Was this
15 specific action done to avoid Richard?

16 A. I don't remember.

17 Q. Okay. And do you ever end up -- I might
18 have asked you this earlier, so forgive me, but did
19 you ever end up going to lunch or dinner with
20 Richard?

21 A. No, I did not.

22 Q. Did he ever end up coming to your house?

23 A. No.

24 Q. Okay. So I'm looking at Page 16 now, line

1 665.

2 Miss Jindal: Yeah. I mean, there was one
3 time during the conversation at the car, and I don't
4 remember what he asked me, but it was after -- like
5 it was even, I think, like worse than asking me if I
6 was a virgin. I don't remember what he asked me
7 because I was just, like, so uncomfortable. But I
8 remember saying like -- I was just like ah, a, ah,
9 and then he just, like, changed the subject.

10 As we sit here today do you recall what
11 that comment would have been?

12 A. No, I don't.

13 Q. Okay. Just figured I would ask.

14 A. Sorry.

15 Q. It's okay. Did you ever tell anybody
16 outside of Doug Murray that Richard had made you feel
17 uncomfortable and made inappropriate statements to
18 you?

19 A. Not that I can remember, no.

20 Q. And when I asked this, you know, I'm not
21 blaming or anything like that. But why didn't you
22 ever report him to anybody within the mayor's office
23 or within the city?

24 A. I think it was because I was -- not I

1 think; I know. It was because I was so new, and I
2 wasn't trying to start anything, and also I felt like
3 maybe I was reading into stuff. Until that one
4 incident at the car where he, like, asked if I was a
5 virgin and stuff, that's when I knew, okay, this is
6 definitely uncomfortable and definitely out of line.
7 But after that, I knew I wasn't going to see him
8 again, because the project was ending, like, very
9 shortly after that. So I think I was just like, I'm
10 going to wait this out and then never have to see
11 him, hopefully, again, and that was it. That's why I
12 never really reported it.

13 Q. Understood. Have you seen Richard since
14 the Bloomberg project ended?

15 A. No, I have not.

16 Q. Okay. So he asked you if everything on
17 your body was real. Was he referring -- was it your
18 understanding he was referring to a specific part of
19 your body?

20 A. I don't know. I even asked for
21 clarification, and then that's when he was just like,
22 oh, women just do things, and they look better
23 natural. And then he asked about my eyelashes. I
24 think I was visibly uncomfortable when he asked me

1 that. So I don't know if that deterred him.

2 Q. And what did he ask you about your
3 eyelashes?

4 A. If they were -- if I had, like, anything
5 on them, or if they were my real eyelashes.

6 Q. Did Richard ever ask you -- sorry. Let me
7 scratch that and rephrase. Did Richard ever comment
8 on your makeup?

9 A. I think so. From what I can remember, I
10 remember him saying that you don't wear a lot, which
11 looks nice, but I don't remember exactly when that
12 was. I think it was a conversation at the car.

13 Q. Okay.

14 A. But nothing past that.

15 Q. Did he ever comment on your weight?

16 A. No.

17 Q. Were there any other statements that
18 Richard made to you that you felt were inappropriate
19 that we have not yet discussed today?

20 A. Not that I can remember, no.

21 Q. Did Richard ever bring up your mom again
22 following that conversation in the parking lot?

23 A. Not after that conversation, no. I think
24 I avoided him a lot more after that. Before, yeah,

1 he would, like, say, let's get dinner with your mom
2 or invite me over to your mom's house, yeah.

3 Q. Did you purposely try to avoid Richard?

4 A. Yes. There were a few times, yes.

5 MS. PETERSON: I think that's all that I
6 have for now. So I'll turn it over to Miss Bryans
7 and the city. I may have some follow-up questions
8 after they are done, but that's all I have for now.
9 Thank you.

10 THE WITNESS: Okay.

11 - - -

12 CROSS-EXAMINATION

13 BY MS. BRYANS:

14 Q. Hi, Miss Jindal. My name is Natalie
15 Bryans. I am one of the attorneys for Mr. Richard.
16 And I don't think I'm going to have too many
17 questions for you, but I may jump around a little
18 bit.

19 A. Okay.

20 Q. So going back, you had mentioned that
21 Mr. Richard would call you partner. Did you ever
22 hear him call anyone else partner?

23 A. Not that I can remember. I don't know,
24 but I wasn't like in every conversation with him.

1 Q. Right. Of course. Okay. And when he
2 would call you partner, how did you take this? Did
3 you think he was implying anything romantic?

4 A. No.

5 Q. Okay. And then when he would text you,
6 you mentioned that in your interview that he would
7 text you questions about the Bloomberg project. And
8 you had mentioned that you felt it was an excuse to
9 talk to you. Why did you feel that way?

10 A. Because then when I would respond, it
11 would be like okay. Also when are you free to get
12 lunch or some other type of question that was not
13 related to the Bloomberg project.

14 Q. Okay. So he -- is your testimony that he
15 would text you something about the project, you would
16 respond, and then he would text you things unrelated
17 to the project?

18 A. Not always, but, yes, that's why I felt
19 like some of the times he texted me for the project.
20 It would just be meetings that I don't think that he
21 would really need to, like, ask follow-up. But I
22 understand if he wanted to know if anything happened.
23 But, yes, then he would ask about personal stuff.

24 Q. Okay. And how many times would you say

1 that happened where the conversation would go towards
2 personal things or things unrelated to the project
3 when you were texting?

4 A. I don't think I can -- I don't remember
5 how many times that happened.

6 Q. And you said earlier that you don't
7 typically delete texts, so you think that you would
8 still have all of your conversations?

9 A. Yes, I think I should.

10 Q. Okay. I'm the same way, I never delete
11 anything.

12 So would he always text you first or did
13 you ever initiate a text conversation?

14 A. I don't remember.

15 Q. Okay. That's fine. Were any of his text
16 messages overtly sexual or inappropriate?

17 A. Not that I can remember, no.

18 Q. Did you ever mention anybody that you
19 would text Chief Richard or that he would call you?

20 A. I think I told Doug Murray.

21 Q. What did you tell him, if you can recall?

22 A. I think it was just that I said -- oh,
23 yes, okay. So when I told him that I was really
24 uncomfort -- like after the thing that happened at

1 the car, then I told him, yeah, like, he has texted
2 me, and I just, like, don't want to text him back.
3 So Doug just was like maybe just don't text back or
4 text really short responses so he'll kind of get the
5 hint. And I was like, yeah, that's a good idea.

6 Q. Okay. Got it. So speaking of that
7 conversation in the parking lot, so I just want to
8 make sure. So this happened after one of your
9 meetings for the Bloomberg project, correct?

10 A. One of the focus groups for the Bloomberg
11 project, yes.

12 Q. And it was initially a group of people
13 standing in the parking lot talking in a group?

14 A. Yeah, and I don't remember if that was --
15 I think that was right outside of the building, there
16 was, like, the four of us that were part of the
17 project, we were just like talking about the
18 Firefighter Mile and other stuff, and then we walked
19 to our cars.

20 Q. Okay. And if you can remember, how long
21 the group was standing there together talking, was it
22 like more than five minutes?

23 A. Yeah, it was probably like 15 minutes. It
24 wasn't super long.

1 Q. Okay. And then everyone kind of
2 dispersed, and Mr. Richard walked with you towards
3 your car?

4 A. Yes.

5 Q. Okay. And had he ever walked you to your
6 car before?

7 A. Not that I can remember, no.

8 Q. And were you guys talking about anything
9 as you were walking towards your car?

10 A. Yeah, I'm sure, but I don't remember what.

11 Q. Okay. That's fine. I want to go to Page
12 2 of your interview. So starting at Line 64, kind of
13 in the middle of that line you said: I mean, we were
14 talking, and then he just stopped at the car. And
15 then I was, like, trying to get in the car, and he
16 was just like, oh, wait, I want to ask you a
17 question. And then we just started talking, and then
18 he asked if I had a boyfriend.

19 So was this kind of out of the blue that
20 he asked this?

21 A. Yes. Like we were not talking about
22 anything, that I can remember, we weren't talking
23 about anything like about boys or anything.

24 Q. Okay. And then a little further down, I

1 am looking at Line 77, starting at the end of that
2 line -- or in the middle you say: And I was like,
3 no. And then -- and then like he then -- he asked,
4 okay, if you never had a boyfriend, can I assume.
5 And then I was like -- I knew what he was saying.
6 And I was like what. And then he looked at me like
7 really suggestively.

8 So how did you know what he was saying?
9 Can you explain that to me a little bit more.

10 A. Yeah. So, I mean, at first I didn't, when
11 he first said, can I assume, I didn't know what he
12 meant. But then he was like can I assume. And then
13 I guess I think it was like the way he looked at me
14 or something. I don't know, I just put two and two
15 together, and I assumed that that's what he was
16 talking about, but I didn't, like, openly share until
17 he asked.

18 Q. Okay. So did you ask him what he meant by
19 that?

20 A. Yeah.

21 Q. And then did he say specifically what he
22 meant by that?

23 A. I think so. I don't remember exactly if
24 he did. I think he did. He definitely did because--

1 yes.

2 Q. Okay. So you're thinking he specifically
3 asked, are you a virgin?

4 A. From what I can remember, yes.

5 Q. Thank you for clarifying that. All right.
6 And then from there, you said earlier today that you
7 made the comment something like that's weird that you
8 would ask that, is that right?

9 A. Um-hum, yes.

10 Q. And he just kind of brushed that off?

11 A. Yeah.

12 Q. Okay. And then you said you guys were
13 talking by your car for, I think you said, 45
14 minutes, is that right?

15 A. Yeah, probably around 45.

16 Q. So after he asked you this, if you had a
17 boyfriend, he then asked you if you had been with any
18 minorities?

19 A. He was asking like why I didn't have a
20 boyfriend, and I wasn't really answering. I was just
21 like I think that's a weird question. And then,
22 yeah, after he asked if I was a virgin, and then I
23 answered, and then he said, like, what -- yeah -- do
24 you only -- have you only been with Indian men, and I

1 was like, no. And he asked, have you been with a
2 black man.

3 Q. And when he was asking you like who you
4 had been with, was he asking you like who you had
5 gone on dates with, who you had slept with, like what
6 was he specifically asking?

7 A. Slept with.

8 Q. Okay. Did you tell him, again, at any
9 point that you thought this was weird or an
10 uncomfortable conversation?

11 A. Yes.

12 Q. Okay. Did he say anything when you said
13 that to him?

14 A. Not that I can remember.

15 Q. Okay. Had you guys talked about things
16 like this before or was this the first time?

17 A. No, we hadn't ever talked about this.

18 Q. And then you said you also at some point
19 talked about your mother. What specifically did he
20 ask about her during this conversation?

21 A. So he knew that she was a single mom. So
22 he was asking, like, if she dates, and if she has
23 ever dated someone that's outside of her ethnicity.
24 Has she ever dated a black man, would she ever date a

1 black man, things like that. And I was like, I don't
2 know; you would have to ask her.

3 Q. Did he ask you to set him up with your
4 mom?

5 A. No, not explicitly.

6 Q. Okay. Had he ever met your mom?

7 A. No.

8 Q. Okay. And another thing you said at some
9 point he told you -- he made a comment about not
10 dressing sexy for the Firefighter Mile, I'm
11 paraphrasing, but something along those lines, right?

12 A. Yes.

13 Q. Was that the first time he had ever
14 commented on what you wore?

15 A. I think so, yes.

16 Q. Okay. Were there any other times he made
17 a comment about what you were wearing?

18 A. I don't think so.

19 Q. Okay. In just talking generally, so not
20 for any time you ever spoke with him, was there ever
21 a time he made any comments -- I know you mentioned
22 your eyelashes -- any comments about any other body
23 part?

24 A. No.

1 Q. Okay. Did he ever comment on your hair?

2 A. Not that I can remember.

3 Q. Okay. Did he ever comment or compliment
4 the way you smelled?

5 A. No.

6 Q. Any other comments related to your
7 appearance specifically?

8 A. No. I mean, he said the thing about
9 Indians being pretty, and then was like, look at you,
10 but that was it.

11 Q. Okay. So aside from the conversation you
12 had with him in the parking lot, were there other
13 times after that he asked you about your dating or
14 personal sex life?

15 A. No. That was very close to the end of our
16 project, and I didn't have to see him too many times
17 after.

18 Q. Okay. And you had mentioned -- so before
19 the time in the parking lot, he had asked about your
20 mother before, is that right?

21 A. Yes.

22 Q. So what kinds of things would he ask? Was
23 it always about her dating or who she was interested
24 in?

1 A. No, it was more like about Indian food and
2 asking if he could come over to dinner when she
3 cooks, or saying, like, he wants to meet her, but
4 nothing like about her dating life or anything like
5 that.

6 Q. How often would you talk about your mother
7 with him?

8 A. Not very often.

9 Q. Did he ever say anything that was overtly
10 sexual about your mom?

11 A. No.

12 Q. Okay. And then you had mentioned
13 something about getting lunch or dinner with you and
14 your mother, is that right?

15 A. Yes.

16 Q. And you had also said he would ask you if
17 you wanted to go get something to eat?

18 A. Yes, if we would get lunch.

19 Q. So when he would ask you about this, was
20 it always he wanted to invite you and your mom, or
21 did he want to, like, meet with you one on one? How
22 was that?

23 A. It was mostly just with me.

24 Q. Okay. Did it seem when he brought this up

1 that he was asking you on a date?

2 A. No, I think he was just, like, a friendly
3 way.

4 Q. Okay. Did he ever follow-up with you to
5 like set an actual day or time?

6 A. Yes, yes. So I think in one of the phone
7 calls, he had asked -- maybe it was over text. But I
8 was like really busy so I couldn't that week, so,
9 yeah. And then one time when he stopped, like, my
10 car at the police academy, or, you know, just like
11 waved me down, that's when he had also asked, when
12 can we get lunch. So, yes, he had followed up, but
13 we never --

14 Q. So that time when you say he stopped your
15 car, was it like he physically got in front of it or
16 he just waved you over?

17 A. No, he physically got in front of it.

18 Q. All right. And you had mentioned that
19 there was at least one time where he kind of patted
20 you on the back. Do you recall any other times when
21 he touched you?

22 A. No. It would just be randomly during
23 meetings, but it would just be, like, on my back like
24 that or shoulder.

1 Q. Okay. So like a shoulder pat or
2 something?

3 A. Yes.

4 Q. Okay. So is it fair to say he never
5 touched you in, like, a sexual way?

6 A. Not that I took it like, yeah.

7 Q. Okay. All right. So aside from what you
8 already mentioned, did he ever say anything to you
9 that was overtly sexual?

10 A. No, not that I can remember.

11 Q. Did you ever hear him say something that
12 was overtly sexual or inappropriate to someone else?

13 A. No.

14 Q. Did you ever observe him touch someone
15 else in a way that you felt was inappropriate?

16 A. Not that I can remember, no.

17 Q. Okay. And at some point you said you
18 spoke with Doug Murray, who was also in the mayor's
19 office. When was that?

20 A. I don't remember. I don't remember now.

21 Q. Do you remember what prompted you to speak
22 with him about it?

23 A. Just feeling like uncomfortable.

24 Q. Okay.

1 A. But I don't remember exactly the
2 situation.

3 Q. So was this you think after the time in
4 the parking lot?

5 A. I don't remember, but maybe, yes.

6 MS. BRYANS: Okay. Give me one second. I
7 think that is everything. I'm going to turn you over
8 to Alana, if she has any questions. Thank you so
9 much. I really appreciate it.

10 MS. TANOURY: I don't have anything.

11 MS. PETERSON: I just have a couple
12 follow-up questions.

13 - - -

14 RECROSS-EXAMINATION

15 BY MS. PETERSON:

16 Q. You told me that Shelby -- is it
17 pronounced Beiting or Beiting (pronouncing
18 differently)?

19 A. Shelly Beiting.

20 Q. Shelly Beiting, okay. You told me she was
21 your direct supervisor, is that correct?

22 A. Correct, yes.

23 Q. Did you ever discuss any of your issues
24 with Joe Richard to her?

1 A. Not -- I did at the very -- like right
2 before I reported it.

3 Q. Okay. So this would have been in, like,
4 the October 2019 time frame?

5 A. Yes.

6 Q. Okay. Prior to this October 2019 time
7 frame, did she ever come to you with any concerns
8 about Richard?

9 A. No.

10 Q. Okay. And the text that we mentioned that
11 you're going to see if you still have, did you turn
12 those over to Kathleen Bourke?

13 A. I did not.

14 Q. Did not?

15 A. No.

16 MS. PETERSON: Okay. That is all the
17 questions that I have.

18 Teresa and Alana, you guys are the point
19 of contact for Miss Jindal, even though she's no
20 longer an employee of the city. Are you going to
21 handle trying to get those texts?

22 MS. DEAN: Yes, we will.

23 MS. PETERSON: And you'll let both myself
24 and Natalie know.

1 MS. DEAN: Yes.

2 MS. PETERSON: Okay.

3 (Signature Not Waived.)

4 - - -

5 DEPOSITION CONCLUDED AT 12:43 P.M.

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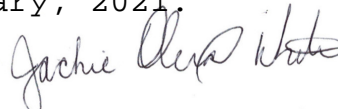
1 CERTIFICATE

2 State of Ohio :
3 SS:
County of Franklin:

4 I, Jackie Olexa White, Notary Public in
5 and for the State of Ohio, duly commissioned and
6 qualified, certify that the within named SUNDEEPTI
7 JINDAL was by me duly sworn to testify to the whole
8 truth in the cause aforesaid; that the testimony was
9 taken down by me in stenotypy in the presence of said
10 witness, afterwards transcribed upon a computer; that
11 the foregoing is a true and correct transcript of the
12 testimony given by said witness taken at the time and
13 place in the foregoing caption specified.

14 I certify that I am not a relative,
15 employee, or attorney of any of the parties hereto,
16 or of any attorney or counsel employed by the
17 parties, or financially interested in the action.

18 IN WITNESS WHEREOF, I have set my hand and
19 affixed my seal of office at Columbus, Ohio, on this
20 9th day of February, 2021.

21 

22 JACKIE OLEXA WHITE, Notary Public
23 in and for the State of Ohio
and RPR-CM.

24 My Commission expires January 21, 2024.

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